

FILED

1 Christopher W. Arledge (Bar No. 200767)
carledge@onellp.com

2 Peter R. Afrasiabi, Esq. (Bar No. 193336)
pafrasiabi@onellp.com

3 Ian H. Gibson, Esq. (Bar No. 273444)
igibson@onellp.com

4 **ONE LLP**

4000 MacArthur Blvd.
West Tower, Suite 1100
Newport Beach, CA 92660
Telephone: (949) 502-2870
Facsimile: (949) 258-5081

7 Attorneys for Plaintiff, Will Loomis

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 WILL LOOMIS, an individual,

12
13 Plaintiff,

14 v.

15 JESSICA CORNISH, P/K/A JESSIE J, an
16 individual; UNIVERSAL MUSIC GROUP,
17 INC., a Delaware corporation; LAVA
18 RECORDS LLC, a limited liability
company; UNIVERSAL REPUBLIC
RECORDS, business form unknown; and
DOES 1-10 INCLUSIVE,

19
20 Defendants.

2012 JUN 25 PM 3: 02

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY _____

Case No. **CV12-5525 RSWL(JEMx)**

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

20741.1

COMPLAINT

1 Will Loomis, (“Loomis”), by and through his attorneys of record, complains against
2 Jessica Cornish (“Jessie J”), Universal Music Group, Inc., Lava Records LLC, Universal
3 Republic Records, and DOES 1 through 10 (collectively, “Defendants”) as follows:
4

5 **JURISDICTION AND VENUE**

6 1. This is a civil action against Defendants for their acts of copyright
7 infringement in violation of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This
8 Court has subject matter jurisdiction over the copyright infringement under 28 U.S.C. §
9 1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a).

10 2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28
11 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be
12 found and transact business in this Judicial District, and the injury suffered by Plaintiff took
13 place in this Judicial District. Defendants are subject to the general and specific personal
14 jurisdiction of this Court because of their contacts with the State of California.

15 3. On information and belief, Defendants all directly sell or benefit from the
16 direct sale of product in this state and judicial district, and perform or otherwise work in
17 this state and judicial district.

18
19 **PARTIES**

20 4. Plaintiff Loomis is an individual residing in Montecito, California.

21 5. Plaintiff is informed and believes and, upon such, alleges that Jessica Cornish
22 is an individual residing in the United Kingdom.

23 6. Plaintiff is informed and believes and, upon such, alleges that Universal Music
24 Group, Inc. is a Delaware corporation, with its principal place of business in Santa Monica,
25 California.

26 7. Plaintiff is informed and believes and, upon such, alleges that Lava Records is
27 a Delaware limited liability company, with its principal place of business in New York,
28 NY.

1 8. Plaintiff is informed and believes and, upon such, alleges that Universal
2 Republic Records is a business, form unknown, with its principal place of business in New
3 York, NY.

4 9. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues
5 said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this
6 Complaint and insert the true names and capacities of said Defendants when the same have
7 been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the
8 Defendants designated herein as a "DOE" is legally responsible in some manner for the
9 events and happenings herein alleged, and that Plaintiff's damages as alleged herein were
10 proximately caused by such Defendants.

11 12 **STATEMENT OF FACTS**

13 *The Composition Forming the Subject Matter of This Dispute*

14 10. Will Loomis is a rising star in the music business. After releasing their first
15 EP, Loomis' band, Loomis and the Lust, quickly gained nationwide recognition. The
16 group was named one of the "Top 25 New Bands in the World" by MTV Iggy, won an
17 MTVU "Freshman" video award, and was bestowed OurStage.com/New Music Seminar's
18 coveted title of "Artist on the Verge." In addition to the frequent touring, radio play, and
19 social media outlets, the band's songs can be heard on popular TV shows, including NCIS
20 LA and Blue Mountain State.

21 11. The song at issue, "Bright Red Chords," (hereinafter, the "Composition") is
22 among Loomis' most popular. It was written in 2008 and rapidly gained popularity.

23 12. Loomis registered the Composition with the US Copyright Office on October
24 10, 2008 and was given Registration No. Pau003479101.

25 *The Defendants and the Marketplace*

26 13. The Defendants rank among today's most successful musicians, producers,
27 and labels in the pop music category.

1 14. Jessie J is a veritable pop music superstar. She has sold over 11 million
2 singles and 2.5 million records worldwide—an incredible, meteoric rise to fame in a
3 relatively young career.

4 15. Her release of “Domino” took place on or around August 16, 2011 and was
5 met with tremendous success. The single was number one on the UK Singles Chart,
6 number 5 on Australia’s ARIA Charts, and certified platinum in sales by the Recording
7 Industry Association of American on February 7, 2012.

8 16. On information and belief, “Domino” was purportedly written by Jessie J, Dr.
9 Luke, Claude Kelly, Max Martin, and Henry Russell Walter. Dr. Luke and Henry Russell
10 Walter also purportedly produced the track.

11 17. On information and belief, defendants Lava Records LLC and Universal
12 Republic Records signed Jessie J as part of a joint venture and remained the label of record
13 at all times relevant to the infringement at issue.

14 18. On information and belief, defendant Universal Republic Records is owned by
15 defendant Universal Music Group, Inc.

16 19. Despite their immense economic resources and sophistication on basic matters
17 of intellectual property law, Defendants have, on information and belief, violated federal
18 law by willfully infringing the copyrights of Loomis in his song “Bright Red Chords.”
19 Specifically, in or around August, 2011, Defendants reproduced and distributed “Domino,”
20 a song comprised of substantially similar compositional elements to the Composition, and a
21 derivative thereof, without permission, consent, or license from Loomis, the rightsholder to
22 the Composition.

23 20. Defendants’ reproduction and distribution of the Composition, and derivative
24 thereof, continues unabated to this very day.

25 21. In the marketplace, Defendants’ infringing work carries tremendous monetary
26 value. Defendants have sold millions of copies of their derivative work, which translates
27 into significant ill-gotten commercial advantage and revenue generation for Defendants as
28 a direct consequence of their infringing actions.

22. Defendants' infringement of the Composition irreparably harmed the exclusive nature of the work and substantial monetary value for its author.

FIRST CLAIM FOR RELIEF

(Copyright Infringement, 17 U.S.C. § 501)

23. Plaintiff Loomis incorporates here by reference the allegations in paragraphs 1 through 24 above.

24. Loomis is the owner of the copyrights to the Composition, which substantially consists of material wholly original with Plaintiff and which constitutes copyright subject matter under the laws of the United States. Loomis has complied in all respects with the Copyright Act and all of the laws of the United States governing copyrights. The Composition has been timely registered with the United States Copyright Office and received Registration No. Pau003479101.

25. Defendants have directly, vicariously and/or contributorily infringed, and unless enjoined, will continue to infringe Loomis' copyrights by reproducing and distributing and utilized the Composition for purposes of trade in violation of 17 U.S.C. § 501 *et seq.*

26. Defendants have willfully infringed, and unless enjoined, will continue to infringe Loomis' copyrights by knowingly reproducing, distributing and utilizing the Composition and a derivative thereof for purposes of trade.

27. These acts of infringement are willful because, inter alia, the Defendants are sophisticated professional in the music industry with full knowledge of the strictures of federal copyright law and the basic requirements for licensing the use of copyrighted content for commercial exploitation. Indeed, Defendants demand nothing less of entities who use *their* copyrighted content.

28. Defendants reproduced and distributed the infringing composition, "Domino," through numerous channels of trade internationally.

1 29. Defendants have received substantial benefits in connection with the
2 unauthorized reproduction, distribution and utilization of the Composition for purposes of
3 trade, including chart-topping record sales, among other things.

4 30. The actions of Defendants were and are continuing to be performed without
5 the permission, license or consent of Loomis.

6 31. The wrongful acts of Defendants have caused, and are causing, great injury to
7 Plaintiff, of which damages cannot be accurately computed, and unless this Court restrains
8 Defendants from further commission of said acts, Loomis will suffer irreparable injury, all
9 of which it is without an adequate remedy at law. Accordingly, Plaintiff seeks a
10 declaration that Defendants are infringing Loomis' copyrights and an order under 17
11 U.S.C. § 502 enjoining Defendants from any further infringement of Plaintiff's copyrights.

12 32. As a result of the acts of Defendants alleged herein, Loomis has suffered and
13 is suffering substantial damage to his business in the form of diversion of trade, loss of
14 profits, injury to goodwill and reputation, and the dilution of the value of its rights, all of
15 which are not yet fully ascertainable.

16 33. Because of the willful nature of the copyright infringement, Plaintiff is entitled
17 to an award of statutory damages equal to \$150,000 per work infringed.

18 34. Plaintiff has identified at least one work infringed by Defendants, which
19 occurred by way of reproduction and public distribution of the Composition through
20 myriad sales channels.

21 35. The Composition infringed is eligible for statutory damages. Therefore,
22 Loomis is entitled to an award of \$150,000 in statutory damages.

23 36. Alternatively, at Plaintiff's discretion, Loomis is entitled to actual damages in
24 an amount to be proven at trial for the infringement of the Composition.

25 37. Plaintiff is also entitled to attorney's fees in prosecuting this action.

26 ///

27 ///

28 ///

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

1. The Defendants, their officers, agents, servants, employees, representatives, and attorneys, and all person in active concert or participation with them, be permanently enjoined from designing, copying, reproducing, displaying, promoting, advertising, distributing, or selling, or any other form of dealing or transaction in, any and all advertising and promotional materials, print media, signs, Internet websites, or any other media, either now known or hereafter devised, bearing any design or mark which infringe, contributorily infringe, or vicariously infringe upon Plaintiff's rights in the Composition.

2. Defendants be held liable to Plaintiff in statutory damages for copyright infringement, including willful infringement, in accordance with 17 U.S.C. §§ 504(a)(2) & (c) and for costs, interest and reasonable attorney's fees pursuant to 17 U.S.C. § 505.

3. An accounting be made for all profits, income, receipts or other benefit derived by Defendants from the reproduction, copying, display, promotion, distribution or sale of products and services, or other media, either now known or hereafter devised, that improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).

4. Requiring Defendants to account for and pay over to Plaintiff all profits derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff for all damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).

5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).

6. That Plaintiff be awarded any such other and further relief as the Court may deem just and appropriate.

///

///

///

1 Dated: June 25, 2012

ONE LLP

2
3 By: 

Christopher W. Arledge

Peter R. Afrasiabi, Esq.

Ian H. Gibson, Esq.

Attorneys for Plaintiff, Will Loomis

DEMAND FOR JURY TRIAL

Plaintiff Will Loomis hereby demands trial by jury of all issues so triable under the law.

Dated: June 25, 2012

ONE LLP

By: 

Christopher W. Arledge

Peter R. Afrasiabi, Esq.

Ian H. Gibson, Esq.

Attorneys for Plaintiff, Will Loomis

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Ronald S. W. Lew and the assigned discovery Magistrate Judge is John E. McDermott.

The case number on all documents filed with the Court should read as follows:

CV12- 5525 RSWL (JEMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

COPY

Name & Address:

Christopher W. Arledge (Bar No. 200767)
 Peter R. Afrasiabi, Esq. (Bar No. 193336)
 Ian H. Gibson, Esq. (Bar No. 273444)
 ONE LLP, 4000 MacArthur Blvd., W Twr, Ste 1100
 Newport Beach, CA 92660 Tel: 949-502-2870

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

WILL LOOMIS, an individual,

PLAINTIFF(S)

v.

JESSICA CORNISH, P/K/A JESSIE J, an individual;
 UNIVERSAL MUSIC GROUP, INC., a Delaware
 corporation; [Continued on Attachment A Hereto]

DEFENDANT(S).

CASE NUMBER

CV12-5525 RSWL(JEMx)

SUMMONS

TO: DEFENDANT(S): JESSICA CORNISH, P/K/A JESSIE J; UNIVERSAL MUSIC GROUP, INC.;
 LAVA RECORDS LLC; UNIVERSAL REPUBLIC RECORDS; and DOES 1-10 INCLUSIVE

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Christopher W. Arledge of ONE LLP, whose address is 4000 MacArthur Blvd., West Tower, Suite 1100, Newport Beach, CA 92660. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 6-25-12By: NANCY INTERIANO

Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

ATTACHMENT A TO SUMMONS

JESSICA CORNISH, P/K/A JESSIE J, an individual;
UNIVERSAL MUSIC GROUP, INC., a Delaware
corporation; LAVA RECORDS LLC, a limited liability
company; UNIVERSAL REPUBLIC RECORDS, business
form unknown; and DOES 1-10 INCLUSIVE,

Defendant(s)

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself ☐
WILL LOOMIS, an individual,DEFENDANTS
JESSICA CORNISH, P/K/A JESSIE J, an individual; UNIVERSAL MUSIC
GROUP, INC., a Delaware corporation; LAVA RECORDS LLC, a limited
liability company; [Continued on Attachment A Hereto](b) Attorneys (Firm Name, Address and Telephone Number. If you are representing
yourself, provide same.)ONE LLP, 4000 MacArthur Blvd., West Tower, Suite 1100, Newport Beach,
CA 92660; Tel: 949-502-2870; Fax: 949-258-5081

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S.
Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship
of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant.)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place
of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place
of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$ To be determined

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
Copyright Infringement (17 U.S.C. §§ 101 et seq)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 530 General	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE	
<input type="checkbox"/> 490 Cable/Sat. TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 610 Agriculture	PROPERTY RIGHTS
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury-Med. Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations		<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 444 Welfare		SOCIAL SECURITY
<input type="checkbox"/> 891 Agricultural Act	REAL PROPERTY	IMMIGRATION	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 863 DTWC/DIWW (405(g))
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land			<input type="checkbox"/> 690 Other	<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				FEDERAL TAX SUITS
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
					<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

CV12-5525 RSWL(JEMx)

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or

☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or

☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or

☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	United Kingdom (Jessica Cornish); Delaware (Universal Music Group, Inc.); Delaware (Lava Records); New York (Universal Republic Records)

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date June 25, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))